



## GSA Federal Acquisition Training Symposium

April 25 – 26, 2017  
Huntsville, AL

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# Delegation of Procurement Authority Training

- Alliant Small Business GWAC
- Alliant GWAC

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General Services Administration

April 25, 2017

# Training Agenda

- Introduction
- Definitions and Acronyms
- Basic Contract Information
- Scope
- Ordering
- Cost or Pricing
- Tools for Ordering Offices
- Responsibilities
- Summary
- Questions

# ***Introduction***

## Center for GWAC Programs

- GWAC Program Operations Division
- Enterprise Acquisition Division (San Diego, CA)
- Small Business Acquisition Division (Kansas City, MO)

## What is a GWAC?

A Governmentwide Acquisition Contract (GWAC) is defined as a task or delivery order contract for information technology.

- Contracts established by one agency for Governmentwide use
- Operated by an Executive Agency designated by the OMB
- Not subject to the Economy Act



# What is an Interagency Acquisition<sup>1</sup>

Interagency Acquisition is the procedure by which an agency needing supplies or services (Requesting Agency) obtains them using another agency's contract (Servicing Agency), the acquisition assistance of another agency (Servicing Agency), or both

Agencies may presume that direct acquisitions made by qualified individuals are in the best interest of the Government if the vehicle was established under the FSSI, the FSS Program, the Smart Buy Program or **GWACs**<sup>2</sup>

<sup>1</sup>OMB Memorandum, "Improving the Management and Use of Interagency Acquisitions", dated June 6, 2008, p. 2

<sup>2</sup>"OCO's should follow agency policy regarding any additional justification required such as why the vehicle is best suited for the acquisition and the cost effectiveness of the acquisition."

## Interagency Acquisitions – Determination of Best Procurement Approach (aka Best Interest Determination)

- Determination of Best Procurement Approach
  - Are required for both Directed and Assisted Acquisitions
  - Can be documented as part of an agency's planning document (e.g. acquisition plan)
  - Does not require a formal Determination and Finding (D&F) or Justification & Approval (J&A)

### References:

OMB Memorandum, "Improving the Management and Use of Interagency Acquisitions", dated June 6, 2008, p. 4&5 for Best Interest Determination

Memo dated October 31, 2008, Meeting Dept of Defense requirements through Interagency Acquisitions

FAR 17.502-1 General Determination of best procurement approach.

DFAR 217.7802(a)(d)

<http://www.acq.osd.mil/dpap/cpic/cp/faq.html>



## Accessing a GWAC

### ➤ Direct Acquisition

- Requesting Agency conducts acquisition and administers the order

### ➤ Assisted Acquisition

- Servicing Agency conducts acquisition and administers the order on behalf of Requesting Agency for a fee



# ***Definitions and Acronyms***

## Definitions and Acronyms

- **Alliant GWAC or Alliant SB GWAC (B.1)** – “Alliant” and “Alliant SB” are synonymous with the “Basic Contract”
- **Task Order (B.1)** - Task orders issued under the Basic Contract are referred to as “order(s)”
- **GWAC Contracting Officer (GWAC CO) or Procuring Contracting Officer (PCO) (G.3.2)**– The sole and exclusive government official with actual authority to award the Basic Contract and delegate any or all of the contract administration functions to an Administrative Contracting Officer (ACO)

## Definitions and Acronyms *continued*

- **Delegation of Procurement Authority (DPA)** (G.2) – Written authority to issue an order under the Basic Contract
- **Ordering Contracting Officer (OCO)** (G.3.4) - An Authorized User who may place and administer an order under the Basic Contract
- **Information Technology (IT)** – See FAR 2.101 & FAR Part 39
- **Fair Opportunity** – See FAR 16.505. OCO must provide each awardee a fair opportunity to be considered for each order exceeding \$3,500 except as provided for in 16.505 (b)(2)

# ***Basic Contract Information***

## Basic Contract Information

	Alliant	Alliant SB
<b>Primary NAICS Code (K.4)</b>	541512 – Computer Systems Design Services	541512 – Computer Systems Design Services
<b>Program Ceiling (B.4)</b>	\$50 billion	\$15 billion
<b>Term of Basic Contract (F.2)</b>	Five-year base ordering period, plus one five-year option period	Five-year base ordering period, plus one five-year option period
<b>Contract Ordering Period and Option</b>	May 1, 2009 to April 30, 2014 May 1, 2014 to April 30, 2019	Feb 3, 2009 to Feb 2, 2014 Feb 3, 2014 to Feb 2, 2019
<b>Order Period of Performance (F.3)</b>	Maximum order period is up to ten (10) years. Orders may extend no more than five (5) years beyond the expiration of the Basic Contract.	Maximum order period is up to ten (10) years. Orders may extend no more than five (5) years beyond the expiration of the Basic Contract.

## Basic Contract Information

	Alliant	Alliant SB
<b>Contract Access Fee (CAF) (B.5)</b>	The CAF is $\frac{3}{4}$ of one percent (.0075) to be applied to the total price for contractor performance as billed to the government. Payment is made by the contractor.	The CAF is $\frac{3}{4}$ of one percent (.0075) to be applied to the total price for contractor performance as billed to the government. Payment is made by the contractor.
<b>Contract Types</b>	Fixed-Price, Cost-Reimbursement, Time & Materials, Labor Hour	Fixed-Price, Cost-Reimbursement, Time & Materials, Labor Hour

## Basic Contract Information

	Alliant	Alliant SB
<b>Limitations on Subcontracting (G.8)</b>	Not applicable	The GWAC CO will monitor compliance via contractor reporting. OCOs will monitor for subcontractor pass-throughs on orders.
<b>Goals for Subcontracting (H.11)</b>	SB Subcontracting Reports and goals will be monitored at the GWAC level.	Not applicable
<b>Consent to Subcontract (G.9.4)</b>	No subcontractors were evaluated as part of the award process for the Basic Contract. Contractor's must comply with FAR 52.244-2 and FAR 44.2.	No subcontractors were evaluated as part of the award process for the Basic Contract. Contractor's must comply with FAR 52.244-2 and FAR 44.2.



## Basic Contract Information

	Alliant	Alliant SB
Facility clearances (H.7.3)	OCO's have the flexibility to customize this to the appropriate level of security required by their order.	OCO's have the flexibility to customize this to the appropriate level of security required by their order.
Socioeconomic Credit	Small business credit is not available at the Task Order level.	Small business credit is available at the Task Order level.
Number of GWAC Holders	57	*68

# Scope

# Scope

## ➤ General

- Robust scope that provides access to a range of complementary management, technical, and other support services
- IT Services-based solutions may include ancillary non-IT components as long as they are integral and necessary to accomplishing the IT solution
- FEA/DoDEA scope conforms to OMB policy for IT investments and evolves as technology expands

## Scope

### ➤ Ancillary Support

- Ancillary Services (i.e. clerical support; training; construction, alteration and repair, etc.) ***must be integral and necessary*** for the IT services-based solution
- Ancillary Equipment (hardware, software, licenses, racks, mounts, etc.) may be purchased ***if integral and necessary*** for the IT services-based solution

## Scope

### ➤ Telecommunications/Wireless

- Telecommunications, Wireless, and Satellite products and services (C.3.4.1) may be purchased as part of an overall IT services-based solution.
- The ***sole purpose of the requirement may not be*** for a commodity (land mobile radios) or commodity-like service (i.e. transport services - wireless connectivity)

## Scope

### ➤ Leasing of Real and Personal Property

- The Government **will not** be the lessee and it **will not** be liable for cancellation fees should an option not be exercised
- Furthermore, the use of lease-like (incremental) payment arrangements to purchase items, which purport to permit the Government to receive delivery of items and then pay for the full cost of the items over time, **are not** permitted

## Scope

- Indefinite Delivery, Indefinite Quantity, Blanket Purchase Agreements (BPAs) and Letter Contracts **are not** permissible order types
  - Fair opportunity to be considered is required



## Pre Award Scope Review

- Free & Optional Scope Review Value-Add Service
- Review Team
  - Comprised of technical & contracting professionals
  - Meets Tuesday & Thursday weekly
  - Provides a written response (2-5 day turnaround)
- Scope Compatibility Review mailbox
  - Alliant ([alliantsowreview@gsa.gov](mailto:alliantsowreview@gsa.gov))
  - Alliant SB ([sowreview@gsa.gov](mailto:sowreview@gsa.gov))

# *Ordering*

## Fair Opportunity

- OCO must provide each awardee a fair opportunity to be considered for each order exceeding \$3,500 unless a statutory exception is invoked
  - Statutory exceptions [see FAR 16.505(b)(2)]
    - Urgency (fair opportunity causes unacceptable delays)
    - Unique capability (only one awardee can meet requirements)
    - Logical follow-on (sole-source basis in the interest of economy and efficiency)
      - Provided all awardees allotted fair opportunity consideration on original award
    - Necessity to satisfy a minimum guarantee
    - A statute expressly authorizes or requires that the purchase be made from a specified source (i.e., for orders exceeding SAT)
    - Set aside orders for any of the small business concerns identified in FAR 19.000(a)(3)

# Exceptions to Fair Opportunity

- Written justification and approval is required
  - Justification must be documented IAW FAR 16.505(b)(2)(ii)(A-B)
  - Approval level is based on dollar amount of order IAW FAR 16.505(b)(2)(ii)(C)(1-4)
- Posting requirements for orders above the SAT
  - A notice must be published after placing an order exceeding the SAT per FAR 16.505(b)(2)ii(D)(1) or (3)
  - Notice must be published IAW FAR 5.301
  - Notice must be publicly available for a minimum of 30 days at the GPE, <http://www.fedbizopps.gov> IAW 16.505(b)(2)ii(D)(2)
    - Posting is subject to FOIA exemptions [See FAR 16.505(b)(2)ii(D)(4)]
  - Posting is not applicable if it will compromise national security or create other security risks [See FAR 16.505(b)(2)ii(D)(5)]

Note: Interim Rule No. 2 of FAC 2005-50 (effective 3/16/11)

## Ordering *continued*

### ➤ Protest Limitations

- Protests on orders  $\leq$  \$10M not allowed except on the grounds the order increases the scope, period, or maximum value of the GWAC

### ➤ The OCO may exercise broad discretion in developing appropriate order placement procedures

- Streamlined ordering methods per FAR 16.505
- FAR Part 15.3 source selection approach is discretionary
- Oral proposals may be utilized
- A multiphased approach may be implemented

## Ordering *continued*

### ➤ Task Orders Exceeding \$5.5 Million

- A notice of the task or delivery order that includes a clear statement of the agency's requirements
- A reasonable response period
- Disclosure of the significant factors and subfactors, including cost or price, that the agency expects to consider in evaluating proposals, and their relative importance
- Where award is made on a best value basis, a written statement documenting the basis for award and the relative importance of quality and price or cost factors
- An opportunity for a postaward debriefing.

## Ordering *continued*

- Clauses from Basic Contract flow down to the order
- Additional clauses may be included at the order level:
  - Agency-specific clauses and/or additional FAR clauses
    - FAR Part 12, if applicable
  - Special or unique requirements [e.g., Wage Rate Requirements (Construction) (formerly known as Davis Bacon Act; FAR 22.403-1) and Service Contract Labor Standards (formerly known as Service Contract Act; FAR 22.1000)]
  - Tailored Basic Contract clauses and/or provisions from Sections E,F,H and I



# ***Cost or Pricing***

## Cost or Pricing for All Orders

- OCOs must evaluate cost or price and determine the overall price to be fair and reasonable using policies and methods in FAR 15.4 for all orders, ***irrespective of contract type used.***
- When adequate price competition exists, ***generally*** no additional information is necessary to determine the reasonableness of price.
- In accordance with FAR 15.403-1(b)(1), adequate price competition prohibits OCOs from obtaining Certified Cost or Pricing Data

## Cost Reimbursement Orders

- Cost type contracts require further consideration of cost allowability, allocability and realism per the FAR and customer agency policy.
- Cost Realism - proposed cost elements are realistic for the work to be performed; reflect a clear understanding of the requirements; and are consistent with offeror's technical proposal
- FAR compliant Cost Realism analysis shall be performed in evaluating quotes and proposals for all cost reimbursement orders to determine the probable cost of performance

## Alliant T&M/LH Labor Rates

- Basic Contract Section J (Atch 2 &3) provides the competitive Loaded Hourly Labor Rates within CONUS for T&M/LH type Orders only
- Subcontractor rates were not evaluated
- No labor rates are provided for OCONUS requirements (See Department of State URL: <http://www.state.gov/m/a/als/>)
- These rates may also be used for developing IGCEs

## Alliant T&M / Labor Hour Rates

- Deviations from established hourly labor rates (B.7.4)
  - Generally, these rates should not be exceeded
  - However, the OCO is authorized to establish different hourly rates suited to meet the ordering agency's unique requirements such as: geographic location or security clearances and;
  - Contractors shall explain in their Order proposals any loaded hourly labor rates that exceed the rates in the Basic Contract

## T&M/LH Considerations

- Unique Professional Skills (contract section H.3)
  - Professional skills that do not have an appropriate labor category or rate established in Basic Contract
  - Contractor may propose and OCO may accept a new labor category and negotiate an appropriate rate at the Order level—OCO is the determining authority

# ***Tools for Ordering Offices***



## OCO Tools

- GSA e-Buy- an online request for quotes tool, ([www.ebuy.gsa.gov](http://www.ebuy.gsa.gov)) <sup>1</sup>
  - RFQ/RFP handled electronically
  - Rapid response to RFI/SOW/SOO
  - Ensures transmittal of requirements
  
- GSA GWAC On-line Resources
  - Conformed copy of the contract
  - Ordering guides
  - T&M/LH pricing
  - SOW examples
  - GWAC Dashboard ([www.gsa.gov/gwacdashboards](http://www.gsa.gov/gwacdashboards))

<sup>1</sup> [alliantawardees@gsa.gov](mailto:alliantawardees@gsa.gov) Alliant only

## OCO Tools

- The Acquisition Gateway (AG) is a new GSA resource that provides accurate, useful, and unbiased transactional data
  - Within the AG there are Hallways (see next slide)
  - The IT Services Hallway is most closely aligned to the scope of work that GWACs support. E.g., this hallway contains information about cloud computing, help desks, migrating email systems, etc.
- Within the AG, you may also access
  - The Solutions Finder acquisition tool
  - A SOW/PWS/SOO Library
  - Prices paid information (e.g. Alliant and Alliant SB pricing information)
  - Articles that may be useful for market research
  - An interactive community to share your thoughts and information

GSA Customer Service Directors ([www.gsa.gov/csd](http://www.gsa.gov/csd)) can assist with further training



















# ACQUISITION GATEWAY

<https://hallways.cap.gsa.gov/>

Our vision

progress.

## HALLWAYS


-  Administrative Support
-  Card Services
-  Cleaning Supplies & Chemicals
-  Employee Relocation
-  Facilities & Construction
-  Freight
-  Human Capital
-  IT Hardware
-  IT Security
-  IT Services
-  IT Software
-  Motor Vehicles
-  Professional Services
-  Security & Protection
-  Small Package Delivery
-  Telecommunications
-  Tools & Hardware
-  Travel

## PROJECT CENTER

0 Projects      0 Tasks      0 Events

  
Add  
Project

Project Center allows users to pull in resources from Gateway apps to build their acquisition. Feel free to create a sample project to learn about its features.

  
Create  
Sample Project

## SOLUTIONS FINDER

My Agency

Category


Subcategory

View **143** Solutions available Reset

## RESOURCES

-  Shared Services
-  TechFAR Hub
-  eBay Open
-  Prices Paid Portal
-  Statement of Work Library

## COMMUNITY

-  External Government-wide  
**FEDERAL ONLY Demo**  
Tools & Hardware  
Kristy Wilbur, Wednesday, April 06, 2016 - 07:43
-  External Government-wide  
**FEDERAL ONLY Demo**

## EVENTS

**The New GSA Schedules Webinar Training is Here!**  
Wednesday, December 30, 2015 - Thursday, September 29, 2016  
11:00 PM - 6:00 PM - [more ▼](#)

**ARMY CHESS Online training and tutorial**

## NEWS

**Interested in the Future of GSA Schedule 75 Office Supplies and Services?**  
GSA is considering options for reopening Schedule ...

**Green Purchasing News Fall\_2015**  
This article highlights concerns, benefits, and consid...

**Reducing Duplication and Driving Savings in Mobile Devices through Category**

# ***GWAC Program Responsibilities***

## GWAC Program Responsibilities

- Manage contract compliance
  - Conduct post award scope reviews
  - Monitor subcontracting at the Basic Contract level
- Advise customers and contractors on proper use of GWACs
  - Conduct DPA training and issue DPA to OCO
  - Maintain resources on GWAC websites
- Conduct program meetings with contractors

## GWAC Program Responsibilities *continued*

- Perform risk mitigation and contractor oversight
  - Conduct outreach and education
  - Conduct pre-award scope reviews upon request
- Report annually to Office of Management and Budget
  - Assessment of client satisfaction
  - Competition on orders
  - Cumulative number and total dollar value of orders
  - Number and value of performance based orders
- Complete Basic Contract closeout

# **OCO *Responsibilities***



## OCO Responsibilities

- **Pre and Post Award Functions** – OCO responsible for order from acquisition planning to closeout
- **Adhere to Terms and Conditions of DPA:**
  1. **Compliance** - comply with terms and conditions of the GWAC & FAR
  2. **Duration** - maintain valid warrant
  3. **Revocation** - comply with treaty, law, regulation, ethical standards, and federal acquisition policy and procedures to avoid revocation of DPA
  4. **Scope Compliance** - ensure the order is and remains within scope



## OCO Responsibilities *continued*

### ➤ Adhere to Terms and Conditions of DPA:

#### 5. Administrative Reporting

- Report Task Orders in FPDS-NG per customer agency policy
- Provide a complete copy of the Task Order and subsequent modifications to:
  - Alliant: [alliant@gsa.gov](mailto:alliant@gsa.gov) or 619-557-6815 **Or**
  - Alliant Small Business: [alliantsb@gsa.gov](mailto:alliantsb@gsa.gov) or 816-823-1608
- Complete and submit Task Order information form(s) attached to the DPA Memorandum

## OCO Responsibilities *continued*

### ➤ FAR-Based Rules – Key Areas of Responsibility:

- **Fair Opportunity** - ensure all contractors are provided a fair opportunity to be considered per FAR 16.505
- **Funding** - verify funding and comply with appropriation law and financial policy
- **COR/COTR** - if COR/COTR assigned, ensure the extent of their authority and responsibilities are clearly defined per customer agency policy
- **Task Order Protests, Disputes and Claims** - receive and respond to Task Order protests, disputes and claims
- **Monitor, Evaluate and Report Contractor Task Order Performance** – OCOs are required to conduct contractor performance evaluations IAW FAR 42.15, and applicable agency policies. Interim performance evaluations are required for each Task Order IAW agency policy

## OCO Responsibilities *continued*

### ➤ FAR-Based Rules – Key Areas of Responsibility:

- **Cost or Price Analysis and Audits** - perform and document cost and/or price analysis (FAR 15.4) and respond to any related audits
- **Prompt Payment** - ensure prompt payment of conforming contractor invoices
- **Task Order Closeout** - perform order closeout IAW FAR 4.804-5
- **Requests for Information** - respond to requests for information pertaining to Task Orders (i.e., FOIA requests and inquires/audits by: Congress, IG, SBA, GAO, and GSA)

# *Summary*

## Summary

- Comprehensive IT services and IT services-based solutions
- Pre-qualified pool of contractors
- Pre-competed, flexible, easy-to-use contracts that reduce procurement lead times
- A full spectrum of contract types

## Summary

- Small Business credit for federal clients is available under Alliant SB GWAC
- Protest limitations on orders  $\leq$  \$10M
- GSA contract training and client support is readily available

## Small Business Acquisition Division Resources

Small Business Acquisition Division

Alliant SB Fax:

Alliant SB E-mail:

Alliant SB Website:

877-327-8732

816-823-1608

[alliantsb@gsa.gov](mailto:alliantsb@gsa.gov)

[www.gsa.gov/alliantsb](http://www.gsa.gov/alliantsb)

Procuring Contracting Officer: Greg Byrd

Business Development Specialist: Dean Cole

816-823-4356

816-823-2465

Contract & Ordering Guide:

[www.gsa.gov/alliantsb](http://www.gsa.gov/alliantsb)

## Enterprise Acquisition Division Resources

Enterprise Acquisition Division

877-534-2208

Alliant E-mail:

[alliant@gsa.gov](mailto:alliant@gsa.gov)

Alliant Scope Review:

[alliantsowreview@gsa.gov](mailto:alliantsowreview@gsa.gov)

Alliant Website:

[www.gsa.gov/alliant](http://www.gsa.gov/alliant)

Procuring Contracting Officer : Jason Schmitt

619-696-2861

Director Client Support: Mimi Bruce

877-534-2208

Technical Services Specialist: Paul Bowen

617-565-6570

Contract & Ordering Guide:

[www.gsa.gov/alliant](http://www.gsa.gov/alliant)



# Questions



**Thank you!**